Exhibit A

in Support of Trend Micro, Inc.'s Opening Claim Construction Brief

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

KAJEET, INC.)
Plaintiff,) CASE NO. 6:21-CV-389-ADA
v.) JURY TRIAL DEMANDED
TREND MICRO, INC.,)
Defendant.)

DECLARATION OF SAMUEL J. RUGGIO IN SUPPORT OF DEFENDANT'S OPENING CLAIM CONSTRUCTION BRIEF

- I, Samuel J. Ruggio, declare as follows:
- 1. I am an attorney with Benesch, Friedlander, Coplan & Aronoff LLP, and I am one of the attorneys of record for Defendant Trend Micro, Inc. ("Trend Micro" or "Defendant") in the above captioned matter.
- 2. I make this declaration on my own information, knowledge, and belief in support of Trend Micro's Opening Claim Construction brief.
- 3. Attached hereto as Exhibit 1 is a true and correct copy of an Amendment and Response to Office Action for U.S. Patent No. 8,667,559 ("the '559 patent"), as filed October 17, 2013.
- 4. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 7,899,438, which issued on March 1, 2011.
- 5. Attached hereto as Exhibit 3 is a true and correct copy of U.S. Patent Application's No. 11/881,460 ("the '460 application") originally filed specification and claims.

- 6. Attached hereto as Exhibit 4 is a true and correct copy of a Preliminary Amendment filed in connection with the '460 application prosecution, dated March 27, 2008.
- 7. Attached hereto as Exhibit 5 a true and correct copy of a journal reference, Choudhary et al., *Policy-Based Network Management*, BELL LABS TECH. J., Vol. 9(1), pp. 19-29 (2004).
- 8. Attached hereto as Exhibit 6 is a true and correct copy of an entry from Merriam-Webster's Online Dictionary for the word "request" from December 9, 2006, as retrieved by the Wayback Machine Internet Archive, obtained on October 13, 2021.
- 9. Attached hereto as Exhibit 7 is a true and correct copy of an entry from Merriam-Webster's Online Dictionary for the word "request," as retrieved on October 13, 2021.
- 10. Attached hereto as Exhibit 8 is a true and correct copy of U.S. Patent Application Publication No. US 2006/0025139, which published on
- 11. Attached hereto as Exhibit 9 is a true and correct copy of Exhibit E, entitled Declaration of Dr. Charles D. Knutson in Support of Plaintiff's Response In Opposition to Defendant's Motion to Dismiss), which was attached to the Second Amended Complaint in the case of *Kajeet, Inc. v. Qustodio, LLC*, C.A. No. 8:18-cv-01519-JAK-PLA (C.D. Cal. Nov. 22, 2019), and bears the Docket Item No. 146-6.
- 12. Attached hereto as Exhibit 10 is a true and correct copy of a journal reference, Brenner et al., *The Open Mobile Alliance and Trends in Supporting the Mobile Services Industry*, Bell Labs Tech. J., No. 10(1), pp. 59-75 (2005).

I declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct.

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Dated: November 5, 2021	/s/ Samuel J. Ruggio
	Samuel J. Ruggio